

**REMARKS**

By this Amendment, claim 12 is added. Accordingly, claims 1-12 are pending in this application. Reconsideration is respectfully requested.

Applicants gratefully acknowledge the courtesies extended to Applicants' representative in the telephone interview conducted on August 27, 2004. The substance of the interview is incorporated into the following remarks, and constitute Applicants' record of the interview.

Applicants gratefully acknowledge the Office Action indication that claims 4-6 recite allowable subject matter. However, Applicants respectfully submit that all claims are in condition for allowance.

The Office Action rejects claims 1, 8-9 and 11 under 35 U.S.C. §102(b) over U.S. Patent No. 5,473,466 to Tanielian et al. (hereinafter "Tanielian"). This rejection is respectfully traversed.

As discussed during the telephone interview, Applicants submit that Tanielian does not disclose "a plurality of first conductor layers and a plurality of second conductor layers arranged to intersect with each other at positions corresponding to the individual pixels," as recited in claim 1. Tanielian discloses that the windings 26 and 30 are formed in a sinuous pattern, such that they overlap only around the periphery of the pixel (see, for example, Figs. 4 and 5 of Tanielian). Furthermore, Tanielian discloses in col. 5, lines 29-33 that "each of the windings 26 is preferably provided in a sinuous path so that it is disposed only around the periphery of each pixel in the individual one of the rows and does not extend across such pixel." Therefore, as agreed to during the telephone interview, because the windings 26 do not extend across the pixel, they cannot intersect with windings 30 at a position corresponding to the individual pixels.

Claims 8-9 and 11 depend from claim 1 and are patentable for at least the reasons set forth above with respect to claim 1, as well as for the additional features they recite.

Applicants respectfully request that the rejection of claims 1, 8-9 and 11 under 35 U.S.C. §102(b) be withdrawn.

The Office Action rejects claims 2-3, 7 and 10 under 35 U.S.C. §103(a) over Tanielian. This rejection is respectfully traversed.

Claims 2-3, 7 and 10 depend from claim 1, and are patentable for at least the reasons set forth above with respect to claim 1, as well as for the additional features they recite.

Applicants therefore respectfully request that the rejection of claims 2-3, 7 and 10 under 35 U.S.C. §103(a) be withdrawn.

Claim 12 depends from claim 1, and is patentable for at least the reasons set forth above with respect to claim 1, as well as for the additional features it recites.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-12 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Jaquelin K. Spong  
Registration No. 52,241

JAO:JKS/scg

Date: August 30, 2004

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

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